# **NOTICE**

All drawings located at the end of the document.

# NO FURTHER ACCELERATED ACTION JUSTIFICATION FOR RETENTION POND C-1

PAC REFERENCE NUMBER: SE-142.10

**IHSS Reference Number** 

SE-142 10

Unit Name

Retention Pond C-1

Approximate Location

N747,000, E2,088,000

Date(s) of Operation or Occurrence

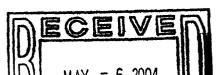
1955 - Present

# Description of Operation or Occurrence

IHSS 142 10 (Pond C-1) at the Rocky Flats Environmental Technology Site (RFETS) was constructed in 1955 to provide temporary holding and monitoring of Woman Creek waters including discharge from Ponds 6, 7, and 8 (Pond C-1 was also referred to as Pond 9 prior to the early 1970s) The first discharge from Pond C-1 was observed on March 29, 1955 Figure 1 shows the location of Pond C-1 (IHSS 142 10) at the RFETS

Ponds 6, 7, and 8 were located adjacent to Woman Creek upstream from Pond C-1 Pond 6 (PAC SW-196) received water treatment plant backwash, Pond 7 (PAC SE-1600) received steam condensate from the Building 881 cooling towers and could have received sewage lift station overflows, and Pond 8 (PAC SE-1601) probably received Building 881 cooling tower overflow/blowdown See Historical Release Report descriptions for PAC SW-196, PAC SE-1600, PAC SE-1601 1, and PAC SE-1601 2 for a more complete discussion of these ponds (DOE 1992) It is believed that Pond 6 was a multi-purpose pond, with the following materials being placed in the pond in October 1954 ashes from the plant incinerator, graphite, used caustic drums, and general trash Pond 6 is currently filled in and is located within the boundaries of the Original Landfill Pond 6 is being addressed as part of the Original Landfill Interim Measure/Interim Remedial Action Ponds 7 and 8 (PACs SE-1600 and -1601) were approved for No Further Accelerated Action in 2002 Ponds 6, 7, and 8 are no longer in existence and never received an alpha-numeric designation like Pond 9 (now Pond C-1) The numeric pond numbering system at the RFETS was replaced by an alpha-numeric system in the early 1970s

The South Interceptor Ditch was constructed in 1979 in order to re-route runoff from the southern portions of the RFETS main manufacturing area to Pond C-2 (IHSS 142 11) Water from the South Interceptor Ditch is the only input to Pond C-2, allowing Pond C-2 to serve as a surface water retention and spill control pond Woman Creek flow enters Pond C-1, which serves as a flow-through



temporary detention pond Discharges from Pond C-1 are routed around Pond C-2 and back into the natural Woman Creek channel (DOE 1992)

Problems or releases that are known to have occurred in Woman Creek as summarized in the Historical Release Report (DOE 1992) are listed below

- Sanıtary sewer overflow and discharge of untreated sanıtary sewage were released to Woman Creek Discharges ceased on February 21, 1955
- A release of 2,700 gallons of steam condensate from Building 881 to Pond 7 occurred due to a break in the process waste line leading to Building 774 The break occurred on September 27, 1955
- Pond C-1, the drainage, and the general area near Pond C-1 (and Pond C-2) are believed to have been impacted by re-suspended soil and runoff from the 903 Pad area (PAC 900-112 and PAC 900-155)
- An armored vehicle turned over into Woman Creek upstream of Pond C-1 on October 19, 1975 (PAC SW-1700) An oil slick was observed on the C-series drainage west of the clay pits during the week of October 20, 1975 This oil slick was not observed at Pond C-1 nor where the C-Series drainage passed beneath Indiana Street The source of this oil slick is believed to be from the overturned vehicle (PAC SW-1700)
- Leakage from the South Interceptor Ditch to Woman Creek near the outfall of the Building 881 footing drain was observed during the week ending March 12, 1982 Repairs to the South Interceptor Ditch were requested. It is unknown if repairs were made at that time, however, it is known that sloughing in the Building 881 area of the ditch had greatly reduced its capacity, and accordingly, temporary sandbags were placed along the embankments in the early 90's to provide for additional capacity.

#### Physical/Chemical Description of Constituents Released

Monitoring of effluents discharged offsite from the Woman Creek drainage has routinely taken place since the first discharge from Pond C-1 In 1955 these analyses consisted of daily composite samples for pH, nitrate, and radionuclide activity, with a detailed mineral analysis on a monthly composite More recently, the analytes that have been monitored in offsite discharges from the C-Series drainage have consisted of pH, nitrate as nitrogen, and nonvolatile suspended solids Pond C-1 sediments are known to contain low levels of plutonium, americium, and uranium contamination (DOE 1992)

Some data are available on the characteristics of the backwash and sludge blowdown waters from the water treatment plant. The 1953 data indicate that the water discharged from the water treatment plant was very turbid, slightly basic, and had a slightly higher concentration of dissolved chemicals than the raw water treated by the water treatment plant (DOE 1992)

## Responses to Operation or Occurrence

Discharges of cooling tower wastes (Building 881 steam condensate and overflow/blowdown) to Woman Creek ceased when the RFP operators directed these flows to the sanitary wastewater treatment system This re-routing of flows probably occurred in the mid-1970 (DOE 1992)

The water treatment plant backwash waters were discharged to the Woman Creek drainage until a sludge drying bed system was installed for these waters at the water treatment plant. This recycle system was probably installed sometime in the mid-1970s (DOE 1992)

#### Fate of Constituents Released to Environment

Pond C-1 has been characterized based on sediment data collected for the RCRA Facility Investigation/Remedial Investigation (RFI/RI) for the Woman Creek Priority Drainage (OU 5) (DOE 1996a), sediment data collected in accordance with the Sampling and Analysis Plan for Characterization of Pond C-1 (IHSS 142 10) (URS 2002)<sup>1</sup>, and surface water data collected by the Site operators from 1991 through 1996 Figure 2 shows the sampling locations, and Table 1 summarizes the sampling and analysis program As can be seen, sediment samples were analyzed for metals, radionuclides, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs) and Water Quality Parameters (WQP), and surface water samples were analyzed for all analytical suites except PCBs. Although PCBs were not analyzed in surface water, PCBs are relatively insoluble, and there are no Rocky Flats Cleanup Agreement (RFCA) Attachment 5 Surface Water Action Levels (ALs) for PCBs (DOE et al 2003) Surface water was sampled frequently between 1991 and 1996 for total radionuclides. In 1991, there were several samples collected for dissolved radionuclides, total and dissolved metals, as well as organics. Surface water sampling and analysis for Pond C-1 ceased after 1996 in accordance with the Integrated Monitoring Plan (DOE 1997)

The sediment and surface water data are summarized in Tables 2 and 3, respectively These tables show analytes that were detected above background (see discussion below) In these tables, the following decision rules were applied to the calculation of summary statistics

<sup>&</sup>lt;sup>1</sup> Samples (CR- series) were collected by URS to characterize the Pond C-1 sediments in the event that excavation and disposal of sediments were required for the final disposition of the pond Samples were analyzed for radionuclides (gamma spectrometry) and metals (x-ray fluoresence [SW 846 Method 6200])

- 1 Data rejected during validation was eliminated from the data set before computing statistics
- 2 The maximum value is the highest detected value observed
- 3 The average was computed using only data that are above background concentrations

Figures 3 and 4 show for sediment and surface water, respectively, all the data that were detected above background, and that have a RFCA AL [Wildlife Refuge Worker (WRW) soil/sediment AL or surface water AL] The ALs are from RFCA Attachment 5, dated June 5, 2003 (DOE et al 2003) Background levels for inorganic constituents for surface water and sediment are from the Background Geochemical Characterization Report (DOE 1993) All background values used for comparison are the mean background value plus two standard deviations. Any detection of an organic compound is considered an above background level observation.

#### SEDIMENT ASSESSMENT

As shown in Table 2 and Figure 3, the sediments in Pond C-1 contain above background concentrations of several metals, radionuclides, and nitrite. In addition, a few VOCs and SVOCs were detected. The inorganic consitutent concentrations, albeit above background levels, were of the same order of magnitude as the background levels. Both the inorganic and organic constituent concentrations were well below the WRW ALs.

#### APPLICATION OF THE SUBSURFACE SOIL RISK SCREEN

Screen 1 – Are Contaminant of Concern (COC) Concentrations Below RFCA Attachment 5 Table 3 Wildlife Refuge Worker (WRW) Soil Action Levels?

Yes Subsurface soil does not exceed the WRW ALs (see Figure 3) In accordance with Figure 3 of RFCA Attachment 5, Screen 4 is performed next given a "yes" response to Screen 1

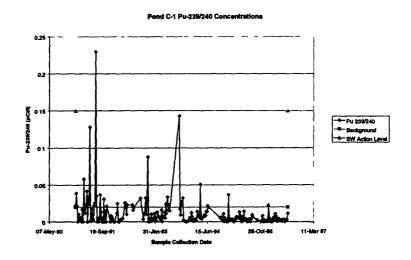
Screen 4 – Is there an environmental pathway and sufficient quantity of COC that would cause exceedance of surface water standards (SWS)?

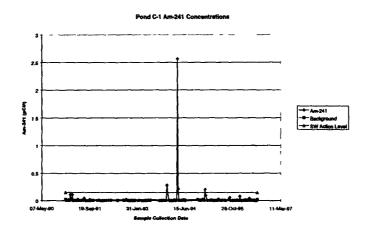
No Pond C-1 is a flow-through pond on Woman Creek, and therefore, erosion is a potentially significant pathway whereby surface water could become contaminated by the sediments. However, the concentrations of the constituents above background in the sediment are relatively low (Table 2 and Figure 3). The few organic compounds that were detected at low levels in the sediment have never been detected in Pond C-1 surface water (compare Tables 2 and 3).

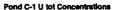
Although the focus of Screen 4 is soil contamination and its potential to impact surface water, because IHSS 142 10 contains surface water some of the time, the quality of the water was examined As shown in Figure 4, radionuclides and to a much lesser extent organics and nitrite have been detected above background levels in Pond C-1 water Of

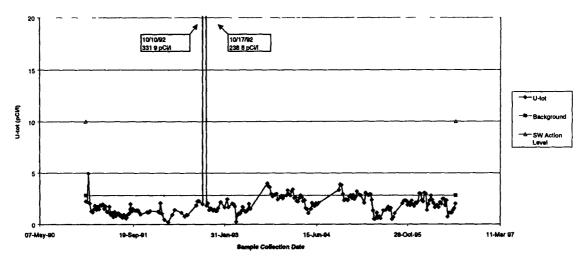
the organics and nitrite, only methylene chloride was above the surface water AL However, the two samples where methylene chloride was above the AL were the only detections of methylene chloride out of a total of 17 samples that were collected for VOC analysis (all of these samples were collected in 1991, and no additional samples have been collected since that time for VOC analysis) The concentrations were relatively low, and methylene chloride was detected in the laboratory blanks, i.e., the presence of methylene chloride in the surface water samples appears to be an artifact because this compound is a common laboratory contaminant

With respect to the radionuclides, Table 3 and Figure 4 indicate plutonium-239,240, americium-241, and uranium-total concentrations have been above background in Pond C-1 surface water samples, and occasionally above the surface water ALs. However, as shown in the following concentration vs. time graphs, concentrations above the surface water ALs were very infrequent. Indeed, the data indicate that most of the radionculide concentrations are below or slightly above the background levels. This indicates the water is rarely impacted, if it is impacted at all (see discussion below)









In the instances where radionuclide concentrations are above the surface water ALs, replicate data for these samples recorded in the Soil Water Database are at much lower concentrations below the surface water ALs (Table 4)<sup>2</sup> These replicate data are more representative of the balance of the data for these radionuclides in Pond C-1 surface water Therefore, it is concluded that reported concentrations above the surface water ALs are spurious based on both the replicate data and the data as a whole

As a final note regarding surface water quality, under RFCA, surface water compliance monitoring is conducted at several locations on Site, including where Woman Creek crosses Indiana Street Pond C-1 is a flow-through retention basin and the water ultimately discharges off the Site in Woman Creek at Indiana Street (compliance monitoring station GS01) if there is adequate flow <sup>3</sup> At GS01, plutonium and americium concentrations have been monitored since October 1996, total uranium concentrations since February 2003, and tritium concentrations from October 1996 through June 2003 (since June 2003, tritium is no longer an Analyte of Interest [AoI]) The monitoring data (DOE 2000, DOE 2001, DOE 2002) show there have never been AoIs at concentrations above the surface water standards (a "reportable value") based on 30-day running averages, which is the metric used for assessing compliance (DOE 1997)

<sup>&</sup>lt;sup>2</sup> For surface water data recorded in SWD, approximately 10% of the data have multiple entries for a given sample and collection date. The figures in this document portray the highest concentration of these replicates. With few exceptions, the data are very similar in magnitude and SWD does not indicate that any of the replicate data have been rejected in the validation process or that some of the replicates are quality control samples. The replicate data shown in Table 4 are all valid results in SWD, however, in these cases, there is considerable variance in the replicate results.

<sup>&</sup>lt;sup>3</sup> Flow in Woman Creek at Indiana Street is likely a mixture of Pond C-1 outflow and runoff from within the Woman Creek drainage downstream of Pond C-1

### **NFAA Summary**

IHSS 142 10 is proposed for NFAA The Subsurface Soil Risk Screen and ALs in RFCA Attachment 5 (DOE et al 2003) have been applied to the characterization data for this IHSS. The risk screen does not indicate that soil or sediment removal is necessary. Sediment contaminant concentrations are well below the WRW ALs. Data indicating concentrations above the surface water ALs appear to be spurious results. Lastly, the monitoring data for GS01 on Woman Creek at Indiana Street show there have never been analytes of interest at concentrations above the surface water standards based on 30-day running averages, which is the metric used for assessing compliance. Therefore, it is concluded that no further accelerated action is required at IHSS 142 10. Ecological effects will be evaluated in the Accelerated Action Ecological Screening Evaluation and the ecological portion of the Sitewide Comprehensive Risk Assessment. The final configuration for Pond C-1 is being determined by the Department of Energy, Kaiser-Hill, L. L. C., and the Fish and Wildlife Service.

#### References

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DOE, 1992, Historical Release Report for the Rocky Flats Plant, Rocky Flats Plant, Golden, CO, June

DOE, 1993, Background Geochemical Characterization Report, Golden, CO, September

DOE, 1996a, Final Phase I RFI/RI Report Woman Creek Priority Drainage, Operable Unit 5, RF/ER-96-0012 UN, Rev 0 Rocky Flats Environmental Technology Site, Golden, CO, April

DOE, 1996b, Final Rocky Flats Cleanup Agreement, Department of Energy, Rocky Flats Environmental Technology Site, Golden, CO, July

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DOE, CDPHE, EPA, 2003, Modifications to the Rocky Flats Cleanup Agreement Attachment, U S Department of Energy, Colorado Department of Public Health and Environment, and U S Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, June

URS, 2002 Sampling and Analysis Plan for Characterization of Pond C-1 (IHSS 142 10), URS Corporation, September

Table 1 Pond C-1 Analytical Program

1 Greater than 100 samples were collected between 1991 and 1996
2 Less than 15 samples were collected, all in 1991
\* Sampling field notes indicate the end depth is at the base of the sediments

Table 2 Summary of Sediment Contamination at Pond C-1

Analyte	Total S Number Samples Analyzed	Detection Frequency	Consentation	Maximum (Concentration	Background Wean 70s 250.	Reinge Rollinge Rollinger Actor Level	Unit
Arsenic	11	55%	108	14.5	7 24	22 2	mg/kg
Barrum	11	100%	690 8	880	188 17	26400	mg/kg
Benzoic Acid	3	%29	300 0	410	•	1000000000	ug/kg
Chromium	11	82%	40 5	453	23 23	268	mg/kg
Copper	11	91%	54 1	83 5	27 27	40900	mg/kg
Di-n- butvlohthalate	6	%05	110.0	110		00000282	וומ/אמ
Iron	=	91%	357100	43400	21379 01	307000	ma/ka
Manganese	11	18%	747 0	749	659 22	3480	mg/kg
Mercury	2	%00 <b>1</b>	15	16	0 34	25200	mg/kg
Naphthalene	3	33%	2.0	2	•	0000608	ug/kg
Nickel	11	91%	39 4	49 4	17 89	20400	mg/kg
Nitrite	2	100%	12	13	0 72	102000	mg/kg
Plutonium- 239/240	13	8%	14	14	1 35	50	pCı/g
Selenium	10	%09	28	3 93	1 55	5110	mg/kg
Strontium	11	73%	255 3	378	201 44	613000	mg/kg
Tetrachloroethene	2	20%	10	1	•	615000	ug/kg
Toluene	3	%29	450 0	520	•	31300000	ug/kg
Uranium-234	13	62%	82	13	3 98	300	pCI/g
Uranium-235	13	62%	0.5	0 59	0 15	8	pCI/g
Uranıum-238	13	%69	7.7	13	3 46	351	pCI/g
Vanadium	11	82%	147 6	198	46 83	7150	mg/kg
Zinc	11	91%	139 5	176	104 4	307000	mg/kg
	Above the	Wildlife Refu	Above the Wildlife Refuge Worker or Ecological Receptor Action Level	ological Recepto	r Action Level		

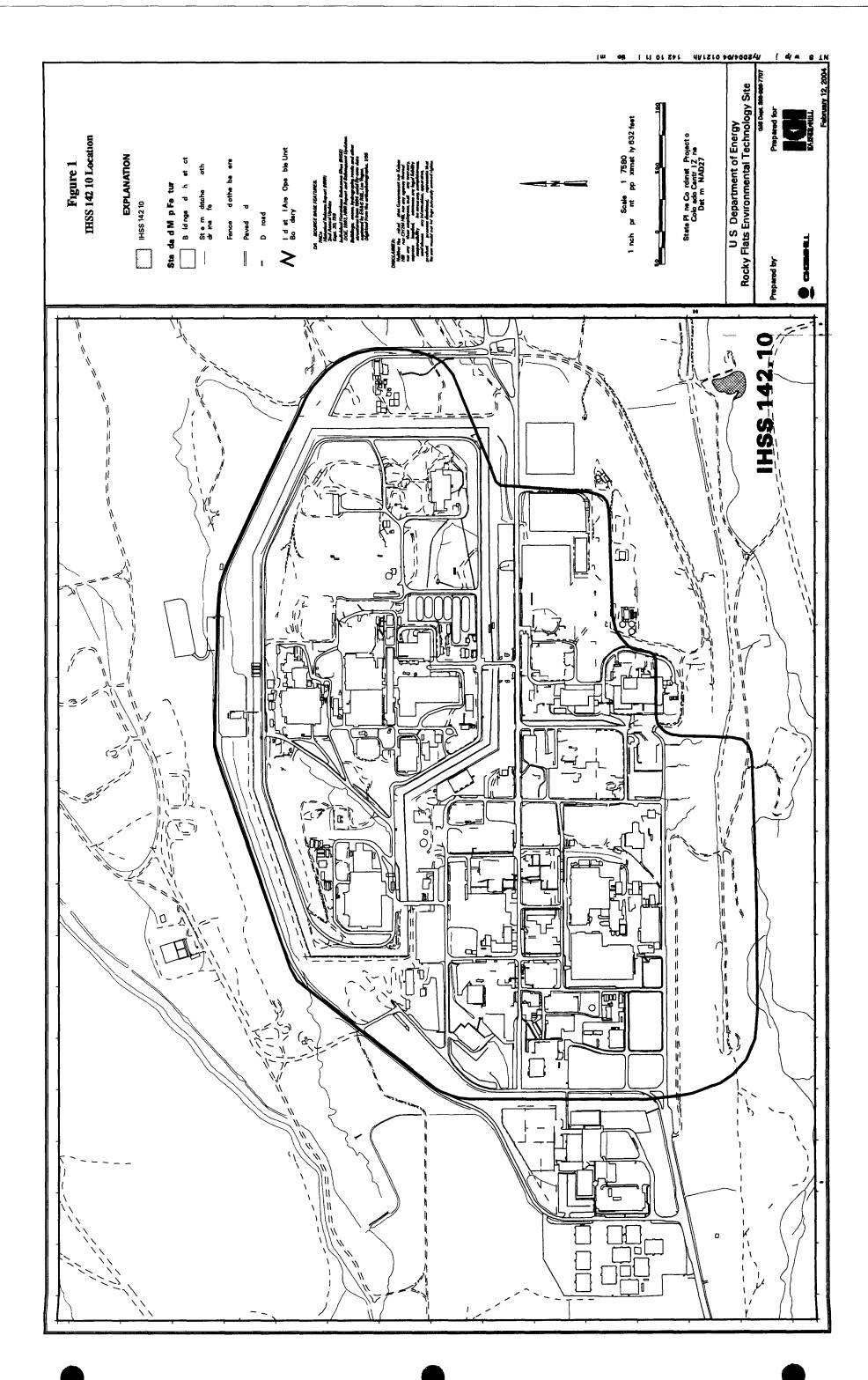
Table 3 Summary of Chemicals Above Background in Pond C-1 Surface Water

Table 5 Samilard J of Chemicals (1991) & Samilar III I one of the chemical (1991)	ACARAGE COLLEGE A A	200	P		
Analyte	Total	Detection	Maximum	Surface Water	UTIL
	Number	Frequency	Concentration	Action Level:	
	Samples				
	Analyzed				-11
Acetone	2	%67	45	3650	ug/L
Amencium-241	<b>261</b>	<b>%9</b>	2,565	0.15	poir
Barrum	13	8%	0 132	0 490	mg/L
bis(2-Ethylhexyl)phthalate	우	20%	-	18	ng/L
Diethylphthalate	9	10%	7	0099	ng/L
Methylene chloride	4	12%	<sub></sub> (8).	24	ug/L
Nıtrıte	31	10%	0 14	90	mg/L
Plutonium-239/240	2777	13%	62.0	SJ.0	TION .
Tritium	295	2	146	20,000	DC//L
Uranium-total	218	15%	ે61.8€	10	pCi/L
	Above the	Surface Wat	Above the Surface Water Action Level		

Table 4 Replicate Surface Water Results Reported in SWD for Radionuclide Samples Exceeding the Action Level

Analyte	Sample Collection Date	Results (pCI/I)
Americium-241	12/11/93	0 2834
		0 01213
		0 001329
		0 001329
	4/2/94	0 00682
		2 565
	4/9/94	0.215
		0 002064
1		0 01384
	1/14/95	-0 0002966
		0 2041
Plutonium-239/240	7/15/91	0 23
Uranium-total	10/10/92	331 9
		22
	10/17/92	238.8
		19

Bold face indicates concentration exceeds the Surface Water AL



142 10 13 Jeotaly2004/04 0121Ah February 12, 2004 U S Department of Energy Rocky Flats Environmental Technology Site Scale 1 890 1 nch pr se t approximat ly 74 feet IHSS 142 10 Sedument Distribution of Constituents Above Background Stat Pi ne Coordinat Projectio Colo ado Cant al Z Dat m NAD27 EXPLANATION IHSS 142 10 Marie that critical communities for familiary that critical control for any against familiary that critical for any against familiary that critical familiary communities of the critical familiary communities of the critical familiary communities for comm Figure 3 Fence dothe ba Ste da d M p Featur Stream driche dr mage fe tu CHEMILL 01 17 89 142.10 SSET 3900 128000 104.4

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Figure 4  IHSS 142.10 Surface Water Distribution of Constituents Above Background  EXPLANATION	Standa d Map Features Standa d Map Features Sto ms, ditche he de rage to tur Fero nd othe barns	the new world not belong. At something a like the second rights.	State 1 890 1 nch present approximat ly 74 faet  State Pine Coo draft Priecto Colorado Central Zone Dat m NAD27  U S Department of Energy Rocky Flats Environmental Technology Prepared by CHZMHILL KAISER HILL
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